

FARMERS & MERCHANTS BANK,
Foley, Alabama, an Alabama corp-
oration, assignee of NEW DEAL
MOTOR COMPANY, Foley, Alabama

PLAINTIFF

VS

ELNORA POLLARD

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

5603

DEMURRER

Comes now the defendant, by her attorney, and demurs to the
complaint heretofore filed in said cause, and as grounds therefore
would show as follows:

- 1) The complaint fails to state a cause of action.
- 2) That from the caption of the case and from the facts of
the complaint, it is not shown when and if the promissory note
was made payable to the New Deal Motor Company or the Plaintiff.
- 3) No facts are alleged to show the right of Plaintiff
to maintain this suit.

James A. Linn
Attorney for Defendant

I certify that a copy of this demurrer has been mailed
postage prepaid to Forest A. Christian, Attorney for Plaintiff,
this 17th day of July 1963.

James A. Linn
Attorney for Defendant

FILED
JUL 18 1963
ALICE L. DUCK, CLERK
REGISTER

325

FARMERS & MERCHANTS BANK,
Foley, Alabama, an Alabama corp-
oration, assignee of NEW DEAL
MOTOR COMPANY, Foley, Alabama

PLAINTIFF

VS

ELNORA POLLARD

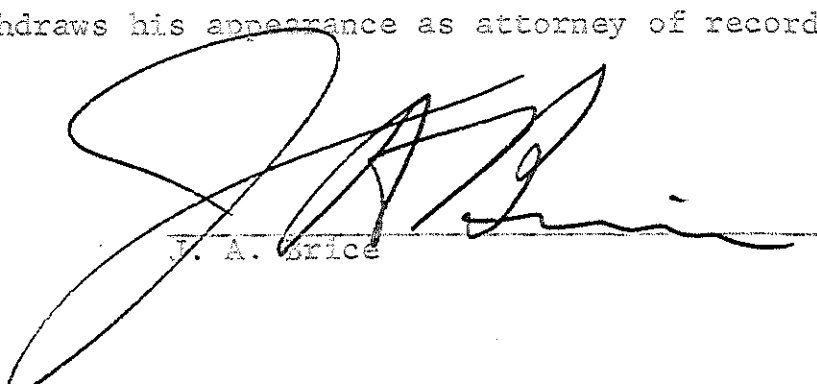
DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

Comes now the undersigned for good and sufficient reasons
heretofore communicated to the defendant, and with the consent
of the defendant, withdraws his appearance as attorney of record
in this cause.



J. A. Brice

SUMMONS

THE STATE OF ALABAMA,)

BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

You are hereby commanded to summon ELNORA POLLARD to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, Alabama, at the place of holding same by FARMERS & MERCHANTS BANK, Foley, Alabama, an Alabama corporation, assignee of NEW DEAL MOTOR CO., Foley, Alabama.

Witness my hand this the 14 day of June, 1963.

Alice J. Duck
Clerk

COMPLAINT

FARMERS & MERCHANTS BANK,)
Foley, Alabama, an Alabama)
corporation, assignee of)
NEW DEAL MOTOR CO., Foley,)
Alabama,)
PLAINTIFF)
VS.)
ELNORA POLLARD,)
DEFENDANT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW
5603

The Plaintiff claims of the Defendant FOUR HUNDRED EIGHTY AND 00/100 (\$480.00) DOLLARS, due by promissory note made by her on the 2nd day of March, 1963, and payable on the 9th day of March, 1963.

Said note provides for a reasonable attorney's fee, which Plaintiff alleges to be ONE HUNDRED AND 00/100 (\$100.00) DOLLARS.

James E. Cummins
Attorney for Plaintiff

The Defendant's address is:
Aaronville - Foley, Alabama

After this suit was prepared, Defendant paid \$150.00.

FILED

JUN 18 1963

Ed-6-18-63

325

ALICE J. DUCK, CLERK
REGISTER

Received 18 day of June 1963
and on 18 day of June 1963
I served a copy of the within 240
on Elnora Pollard

By service on _____

TAYLOR WILKINS, Sheriff

Forest A. Christian
BY J. Long

Sheriff claims 72 miles at
Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff
BY Carline Chidress
DEPUTY SHERIFF

SUMMONS AND COMPLAINT

FARMERS & MERCHANTS BANK, Foley,
Alabama, an Alabama corporation,
assignee of NEW DEAL MOTOR CO.,
Foley, Alabama,

PLAINTIFF

VS.

ELNORA POLLARD,

DEFENDANT

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA